

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 05-11490 JLT

TRAVELERS PROPERTY CASUALTY)
COMPANY OF AMERICA (FORMERLY)
KNOWN AS THE TRAVELERS)
INDEMNITY COMPANY OF ILLINOIS))
INDIVIDUALLY AND A/S/O DACON)
CORPORATION AND A/S/O)
CONDYNE VENTURES, LLC.,)
Plaintiff)
vs.)
GENESIS INDEMNITY INSURANCE COMPANY)
And TIG INSURANCE COMPANY,)
Defendants)
)

**JOINT EMERGENCY MOTION TO EXTEND OPPOSITION
TIME TO RESPOND TO PENDING MOTIONS**

All parties in the above-referenced matter and hereby jointly request this Honorable Court to extend the deadline for filing oppositions to all pending motions. The current deadline for filing opposition is November 15, 2005 and the parties are requesting an additional 2-week extension (until November 29, 2005).

There will be no prejudice as the hearing on the motions is set for January 19, 2006, and a delay in receipt of the opposition will not affect any party.

Respectfully Submitted,

The Plaintiffs,
By their attorney,

/s/ William P. Mekrut
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The Defendants,
Genesis Indemnity Insurance Company
By their attorney,

/s/Jocelyn M. Sedney

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The Defendant,
TIG Insurance Company
By their attorney,

/s/William B. Scarpelli

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Dated: November 14, 2005